

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALQUIN WELLS, aka WORD, aka WILL,
RONELLE DAVIS,
MALCOLM COLLINS,
TRAVON GALES,
RONNIE EDGELL,
LASHAUN MONCRIEF,
MATTHEW KUCERA,
AMBER MOORE,
GLORIA HRDY,
PATRICIA TRUMAN,
MOLLY MEDLIK,
CODY RAY LEE,
LISA GOFORTH,
SHAUNNA COLLIER,
VIRGINIA MAY,
TAMIE SEITZ,
JOHN DICKSON,
ELIZABETH GALLAGHER,
BOBBI BOYLAN,
IMANI NICHOLSON,
DEMARCO CLAYTON,

Defendants.

INDICTMENT

1:19 CR 251

CASE NO.:

Title 21, United States Code,
Sections 841(a)(1), (b)(1)(A),
(b)(1)(B), (b)(1)(C), 843(b), 846;
Title 18, United States Code,
Sections 922(g)(1),
924(c)(1)(A)(i), 1956(h) and 2

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin, Fentanyl, and Fentanyl Analogues, 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C))

The Grand Jury charges:

1. Beginning on or about September 15, 2017 and continuing until on or about April 3, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants ALQUIN

WELLS, aka WORD, aka WILL, RONELLE DAVIS, MALCOLM COLLINS, TRAVON GALES, RONNIE EDGELL, LASHAUN MONCRIEF, MATTHEW KUCERA, AMBER MOORE, GLORIA HRDY, PATRICIA TRUMAN, MOLLY MEDLIK, CODY RAY LEE, LISA GOFORTH, SHAUNNA COLLIER, VIRGINIA MAY, TAMIE SEITZ, JOHN DICKSON, ELIZABETH GALLAGHER, BOBBI BOYLAN, IMANI NICHOLSON did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of fentanyl analogues, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), (b)(1)(B), and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:

A. ALQUIN WELLS and RONELLE DAVIS obtained ounce quantities of heroin, fentanyl, and fentanyl analogues for distribution to redistributors and customers who were part of the Drug Trafficking Organization (“DTO) in the Cleveland, Ohio, area.

B. WELLS and DAVIS distributed heroin/fentanyl to MALCOLM COLLINS, TRAVON GALES, and LASHAUN MONCRIEF, and directed them to redistribute the heroin/fentanyl to customers in the Cleveland, Ohio, area.

C. WELLS, DAVIS, COLLINS, and GALES, sold heroin/fentanyl to RONNIE EDGELL, MATTHEW KUCERA, AMBER MOORE, GLORIA HRDY, PATRICIA TRUMAN, MOLLY MEDLIK, CODY RAY LEE, LISA GOFORTH, SHAUNNA COLLIER,

VIRGINIA MAY, TAMIE SEITZ, JOHN DICKSON, ELIZABETH GALLAGHER, who redistributed the heroin/fentanyl to others.

D. GOFORTH, COLLIER, EDGELL, and others warned WELLS about possible law enforcement presence and cooperators to protect the DTO.

E. WELLS allowed other members of the DTO, including DAVIS, NICHOLSON, and others to use his cellular telephone to take heroin/fentanyl orders from customers.

F. WELLS and DAVIS distributed heroin/fentanyl knowing that the heroin/fentanyl was causing overdoses.

G. WELLS, GALES, and other members of the DTO carried firearms to protect themselves, their drugs, and their drug proceeds.

H. WELLS and DAVIS used DAVIS' residence in Sheffield Village, Ohio, to store heroin/fentanyl, process the heroin/fentanyl for sale, and store proceeds from their heroin/fentanyl sales.

I. COLLINS also stored heroin/fentanyl at his residence in Cleveland, Ohio.

J. DAVIS used a US Bank account in the name of IMANI NICHOLSON to conceal his drug proceeds.

K. WELLS, DAVIS, and others used rental vehicles and cars registered to other persons and businesses to conceal their identities and avoid law enforcement detection.

L. Conspirators used multiple telephones to conduct drug trafficking activity by making and receiving telephone calls and sending and receiving text messages and using the FaceTime application to communicate.

M. Conspirators, when using cellular telephones or text messaging to conduct drug trafficking activity, used slang terms, street terminology, and code words and phrases for controlled substances, including referring to the heroin/fentanyl by color, to obscure and disguise the true nature of their activities and the true meaning of their conversations.

N. Conspirators, when using cellular telephones or text messaging to conduct drug trafficking activity, used slang terms, street terminology, and code words and phrases for customers based on the customer's location, to obscure and disguise the true nature of their activities and the true meaning of their conversations.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance thereof, and to effect and conceal the existence of the conspiracy, the Defendants and others performed acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

4. On September 15, 2017, Source 3 [a person cooperating with law enforcement] made a recorded telephone call to ALQUIN WELLS and ordered a half gram of heroin/fentanyl from WELLS. WELLS arrived at the meeting location in Cleveland, Ohio, driving a Range Rover, bearing Ohio license plate HFN225. During the meeting, WELLS sold Source 3 approximately 0.42 grams of a mixture of heroin, fentanyl, and 4-ANPP.

5. On September 19, 2017, Source 3 made a recorded telephone call to WELLS and ordered 1.0 gram of heroin/fentanyl from WELLS. WELLS arrived at the meeting location in Cleveland, Ohio, driving a Mercedes Benz, bearing Ohio license plate MBNZ51. During the meeting, WELLS sold Source 3 approximately 1.0 gram of a mixture of heroin, fentanyl, and 4-ANPP.

6. On September 22, 2017, Source 3 made a recorded telephone call to WELLS and ordered 1.0 gram of heroin/fentanyl from WELLS. WELLS arrived at the meeting location driving a white Infiniti, bearing Ohio license plate GOR6757. During the meeting, WELLS sold Source 3 approximately 0.9 grams of a mixture of heroin, fentanyl, and 4-ANPP.

7. On September 29, 2017, Source 3 made a recorded telephone call to WELLS and ordered 1.0 gram of heroin/fentanyl from WELLS. WELLS arrived at the meeting location in Cleveland, Ohio, in a Dodge Durango, bearing Ohio license plate HFR7988. During the meeting, WELLS and DAVIS sold Source 3 approximately 0.98 grams of a mixture of heroin, fentanyl, and 4-ANPP.

8. On October 2, 2017, Source 3 made a recorded telephone call to WELLS and ordered 1.0 gram of heroin/fentanyl from WELLS. WELLS arrived at the meeting location in Lakewood, Ohio, driving a black Infiniti Q-80 SUV, bearing Ohio license plate HDF9138. During the meeting, WELLS sold Source 3 approximately 1.0 gram of a mixture of heroin, fentanyl, and 4-ANPP.

9. On October 9, 2017, Source 3 made a recorded telephone call to WELLS and ordered 1.0 gram of heroin/fentanyl from WELLS. WELLS arrived at the meeting location in Cleveland, Ohio, driving a gold colored Range Rover, bearing Ohio license plate HFN2250. During the meeting, WELLS sold Source 3 approximately 1.03 grams of a mixture of heroin, fentanyl, and 4-ANPP.

10. On October 16, 2017, Source 3 made a recorded telephone call to WELLS and ordered 1.0 gram of heroin/fentanyl from WELLS. WELLS arrived at the meeting location in Cleveland, Ohio, driving a gold colored Range Rover, bearing Ohio license plate HFN2250.

During the meeting, WELLS sold Source 3 approximately 1.07 grams of a mixture of heroin, fentanyl, carfentanil, and 4-ANPP.

11. On November 10, 2017, WELLS was shot three times during a suspected home invasion at a residence on West 125th Street. During the home invasion, two unidentified males took WELLS' gold Range Rover, bearing Ohio license plate HFN2250. The gold Range Rover was later found burned at East 32nd Street, Cleveland, Ohio.

12. On September 19, 2018, Source 4 [a person cooperating with law enforcement] made a recorded telephone call to WELLS and ordered five grams of heroin/fentanyl. WELLS arrived at the meeting location in Cleveland, Ohio, in a black Cadillac Escalade and met Source 4. During the meeting, WELLS sold Source 4 approximately 4.87 grams of a mixture of heroin and fentanyl.

13. On October 2, 2018, at approximately 5:25 p.m., WELLS and Source 4 had a conversation on the telephone. During the conversation, WELLS said, "I'm in a black SUV, meet over by Aldi's, hurry up." Source 4 agreed. WELLS arrived at the meeting location in Steelyard Commons in Cleveland, Ohio, driving a black Q-80 Infiniti SUV, bearing Ohio license HDF9138, and entered the Aldi's parking lot at Steelyard Commons in Cleveland, Ohio. During the meeting, WELLS sold Source 4 approximately 3.0 grams of a mixture of heroin and fentanyl.

14. On October 18, 2018, at approximately 5:00 p.m., Source 4 had a conversation with WELLS on the telephone. Source 4 said, "I want 20 [grams of heroin/fentanyl]." WELLS said, "I'll call you back in five minutes on the other phone."

15. On October 18, 2018, Source 4 had a conversation with WELLS on the telephone. During the conversation, WELLS told Source 4 that "his dude" would be calling Source 4 shortly to complete the drug transaction.

16. On October 18, 2018, shortly after the call with WELLS, Source 4 had a conversation with MALCOLM COLLINS on the telephone. During the conversation, COLLINS told Source 4 that he would supply Source 4 with 20 grams of heroin/fentanyl for \$60 per gram and instructed Source 4 were to meet to conduct the transaction.

17. On October 18, 2018, at approximately 5:30 p.m., a black Infiniti Q-80, bearing Ohio license HDF9138 arrived at the meeting location in Cleveland, Ohio. During the meeting, the driver sold Source 4 approximately 19.89 grams of a mixture of heroin and fentanyl.

18. On November 16, 2018, Source 4 made a recorded call to WELLS and ordered on gram of heroin/fentanyl. WELLS arrived at the meeting location driving a Cadillac Escalade. During the meeting, WELLS sold Source 4 approximately 0.87 grams of a mixture of heroin and fentanyl.

19. On December 28, 2018, at approximately 12:28 p.m., Source 4 had a text message conversation with WELLS. Source 4 texted, "I need 10 [grams of heroin/fentanyl] ca u do a deal tho?" WELLS texted, "400 [\$400 for 10 grams of heroin/fentanyl]." Source 4 texted, "OK cool about to b omw [on my way] then." WELLS texted, "500 [\$500 for 10 grams of heroin/fentanyl]." Source 4 texted, "OK."

20. On December 28, 2018, at approximately 12:15 p.m., Source 4 met with WELLS in Cleveland, Ohio. WELLS arrived in a Toyota SUV bearing Ohio license plate HKF2549, belonging to DAVIS. Source 4 met with WELLS at the passenger window of DAVIS' Toyota SUV where WELLS was seated. During the meeting, WELLS sold Source 4 approximately 9.59 grams of a mixture of heroin and fentanyl.

21. On January 4, 2019, Source 4 had a recorded conversation with WELLS and ordered heroin/fentanyl. WELLS arrived at the meeting location in Brooklyn, Ohio, as a

passenger in DAVIS' Toyota SUV. During the meeting, WELLS sold Source 4 approximately 3 grams of a mixture of heroin and fentanyl.

22. On January 17, 2019, at approximately 7:08 p.m., WELLS had a conversation with AMBER MOORE on the telephone. WELLS said, "Yeah, where you at?" MOORE said, "Leaving the bank right now, in Parma." WELLS said, "What do you want?" MOORE said, "I think two hundred [\$200 worth of heroin/fentanyl]." WELLS said, "Call me."

23. On January 17, 2019, at approximately 8:03 p.m., WELLS had a conversation with GLORIA HRDY on the telephone. HRDY said, "Hey, can I have a gram and a half [heroin/fentanyl]?" WELLS said, "Yep."

24. On January 17, 2019, at approximately 8:35 p.m., WELLS had a conversation with JOHN DICKSON on the telephone. DICKSON said, "I need two [two grams of heroin/fentanyl], I'm over by Sprague." WELLS said, "Go to the Steelyard." DICKSON said, "Ok."

25. On January 18, 2019, at approximately 9:29 a.m., WELLS had a conversation with LISA GOFORTH on the telephone. GOFORTH said, "I need one and a half [grams of heroin/fentanyl]. WELLS said, "Alright."

26. On January 18, 2019, at approximately 11:29 a.m., WELLS had a conversation with an ELIZABETH GALLAGHER on the telephone. GALLAGHER said, "Can I get two [grams of heroin/fentanyl]?" WELLS said, "Alright, here I come."

27. On January 18, 2019, at approximately 4:58 p.m., WELLS had a conversation with GOFORTH on the telephone. WELLS said, "What's up?" GOFORTH said, "I need three [grams of heroin/fentanyl]." WELLS said, "Alright."

28. On January 18, 2019, at approximately 5:20 p.m., WELLS had a conversation with CODY RAY LEE on the telephone. WELLS asked, "What you wanted?" LEE said, "A whole one [one gram of heroin/fentanyl]." WELLS said, "Be looking out."

29. On January 18, 2019, at approximately 7:03 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS said, "What up?" WELLS said, "Lakewood [codename for GOFORTH]." COLLINS said, "Alright."

30. On January 18, 2019, at approximately 7:32 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "Yeah." COLLINS said, "Tell 'em to come out [COLLINS was delivering heroin/fentanyl to WELLS' drug customer]." COLLINS said, "Alright."

31. On January 18, 2019, at approximately 7:32 p.m., WELLS had a conversation with GOFORTH. WELLS stated, "Come out."

32. On January 18, 2019, at approximately 7:39 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "Hello." COLLINS said, "Yeah, 58th [codename for HRDY]." WELLS said, "Alright." COLLINS said, "Tell 'em to be looking out."

33. On January 18, 2019, at approximately 7:52 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS says, "I'm here."

34. On January 18, 2019, at approximately 7:52 p.m., WELLS had a conversation with HRDY on the telephone. WELLS stated, "Be lookin' out."

35. On January 18, 2019, at approximately 8:44 p.m., WELLS had a conversation with MOORE on the telephone. WELLS said, "What you wanted?" MOORE said, "I have two hundred [MOORE wants to purchase \$200 of heroin/fentanyl]." WELLS said, "Steelyard." MOORE said, "I'll be there in, like, ten minutes, less than."

36. On January 19, 2019, at approximately 11:12 a.m., WELLS had a conversation VIRGINIA MAY on the telephone. MAY said, "I need a G [one gram of heroin/fentanyl], I got seventy five [\$75]." WELLS said, "Alright."

37. On January 19, 2019, at approximately 1:38 p.m., DAVIS, using WELLS' telephone, had a conversation with HRDY on the telephone. HRDY asked, "Can you bring two grams to my house?" DAVIS said, "Ok."

38. On January 19, 2019, at approximately 2:05 p.m., DAVIS, using WELLS' telephone, had a conversation with PATRICIA TRUMAN on the telephone. TRUMAN said, "Can you bring me one and a half [grams of heroin/fentanyl] to 105th?" DAVIS said, "Alright."

39. On January 19, 2019, at approximately 4:13 p.m., DAVIS, using WELLS' telephone, had a conversation with MOLLY MEDLIK on the telephone. MEDLIK said, "Hey it's MOLLY, I'm at my house on West 117th by DairyMart, I need two [grams of heroin/fentanyl]." DAVIS said, "Alright, come to Saver's, how long?" MEDLIK said, "I'm not driving, Hale usually drops it off on the street next to DairyMart." DAVIS said, "On 117th?" MEDLIK said, "Yeah." DAVIS said, "Alright, here I come."

40. On January 19, 2019, at approximately 4:49 p.m., DAVIS, using WELLS' telephone, had a conversation GOFORTH on the telephone. GOFORTH said, "I need three [grams of heroin/fentanyl], now." DAVIS said, "Alright."

41. On January 20, 2019, at approximately 1:19 p.m., DAVIS, using WELLS' telephone, had a conversation with GALLAGHER on the telephone. GALLAGHER said, "Hey, can I get two [grams of heroin/fentanyl]." DAVIS said, "Alright, here I come."

42. On January 20, 2019, at approximately 1:32 p.m., DAVIS, using WELLS' telephone, had a conversation with GOFORTH on the telephone. GOFORTH stated, "Hey, it's

going to be three [grams of heroin/fentanyl]. You hear me?” DAVIS replied, “Hello?” GOFORTH asked, “Hello?” DAVIS replied, “Be looking out?” GOFORTH stated, “Ok, you’re not going to be able to turn around, so I am just going to be up there, ok?” DAVIS stated, “Alright.” GOFORTH replied, “And make it three, it’s three [grams of heroin/fentanyl].” DAVIS stated, “Alright just tell him [WELLS and DAVIS’ drug associate] when he pull up.”

43. On January 20, 2019, at approximately 7:48 p.m., DAVIS, using WELLS’ telephone, had a conversation with MOORE on the telephone. MOORE stated, “I said, ‘I’m on my way out there now [to complete heroin/fentanyl deal].’” DAVIS replied, “Alright, what you want [how much heroin/fentanyl]?” MOORE stated, “I have two hundred [dollars to buy heroin/fentanyl].” DAVIS replied, “Ok.” MOORE stated, “Alright, you want me to come in or just call you when I’m there?” DAVIS answered, “Just call me when you there.”

44. On January 20, 2019, at approximately 8:06 p.m., DAVIS, using WELLS’ telephone, had a conversation with MOORE on the telephone. Prior to the call beginning, DAVIS had a conversation on another telephone with a drug associate, and DAVIS asked, “Where do you want me to make the people [heroin/fentanyl customers] go?” The associate responded, “Transportation.” During the conversation with MOORE, DAVIS stated, “Can you do me a favor? Come to Transportation Boulevard, to that Get Go.” MOORE answered, “What? Why? I don’t even know where that is.” DAVIS replied, “‘Cause, my people [drug dealing associates], that’s where they went.” MOORE stated, “Oh. Alright.”

45. On January 20, 2019, at approximately 8:27 p.m., DAVIS, using WELLS’ telephone, had a conversation with MAY on the telephone. MAY stated, “Hey? What’s up? You around? I’m driving. I’m calling to get two grams [grams of heroin/fentanyl].” DAVIS stated, “Can you come to Transportation [to buy heroin/fentanyl]?” MAY stated, “I’m driving. What?

Come where?” DAVIS stated, “To Transportation Boulevard [to meet WELLS and DAVIS’ drug associate who is selling heroin/fentanyl for WELLS and DAVIS]?” Later in the conversation, MAY said, “Alright.”

46. On January 20, 2019, at approximately 8:29 p.m., DAVIS, using WELLS’ telephone, had a conversation with TRUMAN on the telephone. DAVIS stated, “Yo.” TRUMAN replied, “Can you bring me a whole one [one gram of heroin/fentanyl] to 105th?” DAVIS replied, “Huh?” TRUMAN repeated, “A whole one to 105th?” DAVIS replied, “Alright.”

47. On January 20, 2019, at approximately 9:46 p.m., DAVIS, using WELLS’ telephone, had a conversation with SHAUNNA COLLIER on the telephone. COLLIER stated, “Dude [COLLIER’s drug customer] wants some more [heroin/fentanyl], so how long?” DAVIS replied, “Man, what I’d just tell you?” COLLIER, “I didn’t hear you.” DAVIS stated, “Well, you shoulda been listening, I told you, ‘When the game go off.’”

48. On January 20, 2019, at approximately 10:27 p.m., COLLIER sent a text message to WELLS’ telephone stating, “He [COLLIER’s drug customer] got 100 [dollars to buy heroin/fentanyl].”

49. On January 21, 2019, at approximately 10:01 a.m., WELLS had a conversation with LEE on the telephone. WELLS stated, “What’s up, talk to me real quick.” LEE replied, “I got ten [dollars for partial heroin/fentanyl purchase payment] right now, someone was going in with me earlier, but could you bring me a half [gram of heroin/fentanyl] just until I get off work, and then I . . .” WELLS stated, “Yeah.” LEE continued, “. . . give you the other thirty [dollars to pay for drugs in full].” WELLS replied, “Alright.”

50. On January 21, 2019, at approximately 10:42 a.m., WELLS had a conversation with MAY on the telephone. MAY stated, "Hey, I just to get a G and a half [1.5 grams of heroin/fentanyl]." WELLS replied, "Alright." MAY stated, "Alright bye."

51. On January 21, 2019, at approximately 5:28 p.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH stated, "You ready for me?" WELLS stated, "Yeah, be looking out." GOFORTH stated, "Alright, I need three [grams of heroin/fentanyl]."

52. On January 21, 2019, at approximately 6:25 p.m., WELLS had a conversation with MEDLIK on the telephone. WELLS asked, "Yo, what's up?" MEDLIK stated, "This is MOLLY, on West 117th, I need two [grams of heroin/fentanyl]." WELLS replied, "Alright."

53. On January 22, 2019, at approximately 1:15 p.m., WELLS had a conversation with MOORE on the telephone. MOORE said, "Can you meet me?" WELLS said, "At Dave's." MOORE asked, "73rd?" WELLS stated, "Yup." MOORE stated, "I'll be there in ten minutes."

54. On January 22, 2019, at approximately 1:36 p.m., WELLS had a conversation with MOORE on the telephone. WELLS said, "What you got?" MOORE said, "Two hundred [\$200 worth of heroin/fentanyl]." WELLS said, "I'm about to pull up."

55. On January 22, 2019, shortly after speaking with MOORE on the telephone, WELLS arrived at the Dave's Supermarket located at Ridge Road and West 73rd Street in Cleveland, Ohio, in DAVIS' Toyota SUV. MOORE arrived driving a white Buick. During the meeting, WELLS and MOORE conducted a hand-to-hand drug transaction.

56. On January 22, 2019, at approximately 6:54 p.m., WELLS had a conversation with GALLAGHER on the telephone. GALLAGHER said, "Can I get three [grams of heroin/fentanyl]?" WELLS said, "Alright."

57. On January 22, 2019, at approximately 6:55 p.m., WELLS had a conversation with TRAVON GALES on the telephone. WELLS asked, "Who this, Trey?" GALES said, "Yeah." WELLS said, "Liz [GALLAGHER]." GALES said, "Liz, which one was that?" WELLS said, "On 140th, by that liquor store, by the fire hydrant. That lady by Marc's and s--t. The yellow house." GALES said, "Alright."

58. On January 22, 2019, at approximately 7:16 p.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH said, "Hey, we got a ride and we need to add one more [gram] to that." WELLS said, "I ain't out there man, I'm not out there, man." GOFORTH said, "What are we suppose to do? I can't wait till tomorrow." WELLS said, "You have to wait till tomorrow."

59. On January 22, 2019, at approximately 7:31 p.m. GOFORTH texted WELLS, "I got enough for 3 [grams of heroin/fentanyl] now and haven't had [heroin/fentanyl] since yesterday, can u plz send someone [WELLS's drug associate to bring heroin/fentanyl] plz, damn I think by now I've showed u my loyalty [as a drug customer], dam u act like that was my fault. I've stuck by ur side from day 1 and this is how u do me, were better then this, I have enough [money] to make it 3 [to purchase 3 grams of heroin/fentanyl] total. What I have is called loyalty and u know ur the only one [only heroin/fentanyl dealer] I f--k with [buy heroin/fentanyl from], period, so for u to leave me hanging this early is dead wrong when I spend 1000s [of dollars] weekly. I even got xans [Xanax pills], I'll just throw u a few if u come back out plz, I'm f--ked if I don't grab tonight, u know I don't f--king keep asking and asking but this is my survival just like urs."

60. On January 22, 2019, at approximately 7:40 p.m., WELLS had a conversation with MEDLIK on the telephone. MEDLIK said, "I need one [gram], I'm on 117th." WELLS said, "Be outside, I'll tell you when to come out."

61. On January 22, 2019, at approximately 7:41 p.m., WELLS had a conversation with GALES on the telephone. WELLS said, "Yeah, 117th Dairy Mart, down the street from Rite Aid. . . . Call me when you get off the freeway so I can tell her [drug customer] to go over there."

62. On January 22, 2019, at approximately 8:08 p.m., WELLS had a conversation with MEDLIK on the telephone. WELLS said, "Go over there, in a black truck, go over there, hurry up." MEDLIK said, "Alright."

63. On January 23, 2019, at approximately 5:38 p.m., MEDLIK had a conversation with WELLS on the telephone. MEDLIK stated, "Hey, I'm on 117th, but I'm driving. Where do you want me to go? Can we meet at Auto Zone or something?" WELLS replied, "What you want [quantity of heroin/fentanyl]?" MEDLIK stated, "One [gram of heroin/fentanyl]." WELLS replied, "Uh, yeah."

64. On January 23, 2019, at approximately 5:40 p.m., MEDLIK sent a text message to WELLS on the telephone stating, "I'm in a big white work van." MEDLIK then texted, "I'm on the side of Auto Zone."

65. On January 23, 2019, at approximately 6:00 p.m., WELLS had a conversation with MEDLIK on the telephone. WELLS stated, "I said, '115th [Street].' And make sure the police" MEDLIK replied, "I'm on 115th. What?" WELLS continued, "Make sure the police ain't coming down that street, 'cause they turned, I don't know where they went." MEDLIK stated, "No, he said, no, there's no police." WELLS stated, "Alright."

66. On January 23, 2019, at approximately 7:15 p.m., WELLS had a conversation with GALES on the telephone. WELLS stated, "I'll call you on my other phone." GALES replied, "Alright."

67. On January 23, 2019, at approximately 7:15 p.m., WELLS had a conversation with GALES on the telephone. WELLS said, "Where the f--k do you want me to send [WELLS drug customers] them at. I got one [drug customer] in Lakewood that ain't driving, but the other one [drug customer] is driving." GALES said, "Transportation or Rockside." WELLS said, "Yeah, you still got to go to Lakewood, and then I'm going to ask them to be at Penn Station in that big ass truck." GALES asked, "Where at in Lakewood?" WELLS said, "S--t where them hoes at, where they always are at, that second street to your, uh, left. . . . Two and one [one customer wants 1 gram of heroin/fentanyl and the other wants 2 grams of heroin/fentanyl]. Tell me when you are on the way so I can tell them to be ready." GALES said, "Alright."

68. On January 23, 2019, at approximately 7:36 p.m., WELLS had a conversation with GALES on the telephone. WELLS said, "And I got one [more drug customer] on 58th when you leave Penn Station." Later in the conversation, GALES asked, "Should I go to 140th first or Penn Station?" WELLS said, "Go to 140th first, then Penn Station, then to Lakewood [GALES meeting three separate customers]. . . . Tell me when you get off the freeway so I can tell them." GALES said, "Alright."

69. On January 23, 2019, at approximately 8:55 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "What's up brother, I'm leaving Strongsville, I need one [gram of heroin/fentanyl]." WELLS said, "Transportation, Steak and Shake [location where to meet GALES to purchase heroin/fentanyl]."

70. On January 23, 2019, at approximately 9:07 p.m., WELLS had a conversation with GALES on the telephone. GALES said, "I only got three grams [heroin/fentanyl] left, so I hope they [WELLS' drug customers] get grams or two or three. You got two and one [one customer gets 2 grams of heroin/fentanyl and the other customer get 1 gram of heroin/fentanyl]?" WELLS asked, "S—t, that's what you got left?" GALES said, "I got three grams left." WELLS said, "Ok, the dude wants one and they should get two." GALES said, "Alright."

71. On January 24, 2019, at approximately 3:25 p.m., WELLS had a conversation with LEE on the telephone. WELLS stated, "What up?" LEE stated, "Yea, you could bring me a whole one [1 gram of heroin/fentanyl] to a 150th [Street]?" WELLS stated, "Alright." LEE stated, "Alright."

72. On January 24, 2019, at approximately 5:07 p.m., WELLS had a conversation with MEDLIK on the telephone. MEDLIK stated, "Hey, I'm on 117th, I'm driving, um, I need, I need one [gram of heroin/fentanyl]." WELLS replied, "Yeah." MEDLIK replied, "Where do you want me to go at 117th, where Rite Aid?" WELLS stated, "I'mma tell you where to go [for drug deal] in a minute."

73. On January 24, 2019, at approximately 5:28 p.m., WELLS had a conversation with TRUMAN on the telephone. TRUMAN asked, "Hey can you bring me a whole one [1 gram of heroin/fentanyl] to 105th?" WELLS asked, "Huh? Yeah, what you wanted?" TRUMAN replied, "A whole one [1 gram of heroin/fentanyl]." WELLS replied, "Alright."

74. On January 24, 2019, at approximately 5:57 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I'm jumping on the highway in Strongsville, I need three [grams of heroin/fentanyl]." WELLS said, "Call me. . . . Penn

Station.” DICKSON said, “Go to Penn Station? I can be to Penn Station in twenty.” WELLS said, “Penn Station.”

75. On January 24, 2019, shortly after speaking with DICKSON on the telephone, WELLS arrived at Penn Station in Cleveland, Ohio, driving DAVIS’ Toyota SUV. Moments later a dark maroon Ford Fusion, arrived and parked next to DAVIS’ Toyota SUV. DICKSON got out of the Ford Fusion and conducted a hand-to-hand transaction with WELLS.

76. On January 24, 2019, at approximately 8:46 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS stated, “I got one [gram heroin/fentanyl sale] on 58th [codename for HRDY].” COLLINS stated, “Who?” WELLS stated, “58th.” COLLINS stated, “Alright.”

77. On January 24, 2019, at approximately 10:52 a.m., WELLS had a conversation with an unknown male on the telephone. The unknown male asked, “Hey, I got a question?” WELLS stated, “What up?” The unknown male stated, “Hey, what if we ain’t got no more Benefiber can we just use all qui [quinine, a substance used to cut the purity of heroin/fentanyl]?” WELLS asked, “Yeah, hell yeah, why not mixing it?” The unknown male stated, “Huh?” WELLS replied, “Yeah. Yep.” The unknown male stated, “Y’all don’t never mix it [cut heroin/fentanyl with both forms of cut]?” WELLS replied, “Yeah, but, yeah but I wouldn’t, mixing mine, I wasn’t mixing mine [WELLS doesn’t cut his own drugs].” The unknown male asked, “But you use all qui [quinine]?” WELLS replied, “Yeah. Yep.”

78. On January 25, 2019, at approximately 10:27 p.m., WELLS had a conversation with GOFORTH on the telephone. WELLS stated, “Yo, what up?” GOFORTH stated, “I need two [grams of heroin/fentanyl].” WELLS replied, “Alright.”

79. On January 25, 2019, at approximately 3:59 p.m., WELLS had a conversation with LEE on the telephone. LEE said, "Yo, can you bring me one and a half [grams of heroin/fentanyl] to 105th?" WELLS said, "Yeah, I'll call you in a minute."

80. On January 25, 2019, at approximately 5:48 p.m., WELLS had a conversation with TRUMAN on the telephone. TRUMAN asked, "Can you bring me whole one [1 gram of heroin/fentanyl] to 105th?" WELLS said, "Yeah, come outside."

81. On January 25, 2019, at approximately 6:09 p.m., WELLS had a conversation with MEDLIK on the telephone. MEDLIK said, "Hey its MOLLY, I'm about to be one 117th, I want one [gram of heroin/fentanyl]. Where do you want me to go?" WELLS said, "Go to West 25th, West Side Market, by Pizza Hut in the plaza." MEDLIK said, "Ok, I know where that is at."

82. On January 25, 2019, at approximately 8:07 p.m., WELLS had a conversation with MOORE on the telephone. WELLS said, "I just rolled by you, you got to come down the street. I just seen you at McDonald's. What you wanted? . . . I am with my kid, and I am trying to make this quick as possible, what you want?" MOORE said, "I got three hundred [\$300 for heroin/fentanyl]." WELLS said, "So what about the money you owe me [from past heroin/fentanyl sales]?" MOORE said, "That is a part of it." WELLS said, "Alright."

83. On January 25, 2019, at approximately 9:13 p.m., COLLIER sent a text message to WELLS' telephone. COLLIER texted, "I need u [to purchase heroin/fentanyl]."

84. On January 25, 2019, at approximately 9:14 p.m., WELLS had a conversation with COLLIER on the telephone. COLLIER said, "I need two [grams of heroin/fentanyl]." Later in the conversation, WELLS said, "Alright, I'm about to tell you where to go in a minute." COLLIER said, "Alright."

85. On January 25, 2019, at approximately 9:15 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS asked, "Where to you want me to send them to?" COLLINS said, "Where you want me to go?" WELLS said, "Bob Evans." COLLINS said, "Alright."

86. On January 25, 2019, at approximately 9:16 p.m., WELLS had a conversation with COLLIER. WELLS said, "Go to Bob Evans [to meet with COLLINS to purchase heroin/fentanyl]." COLLIER said, "Bob Evans on Brookpark?" WELLS said, "Brookpark."

87. On January 26, 2019, at approximately 12:56 p.m., WELLS had a conversation with GALLAGHER on the telephone. GALLAGHER stated, "Hey, WILL, I wanted to know if I can get ten [grams of heroin/fentanyl] for, uh, seven hundred [dollars]?" WELLS replied, "Yeah, come outside." GALLAGHER replied, "Okay, I'mma, I'mma get the seven hundred. I'll be out there in one minute [to complete heroin/fentanyl purchase]."

88. On January 26, 2019, at approximately 2:00 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON asked, "Hey, can you bring me out three [grams of heroin/fentanyl] to Strongsville? I'm up by the mall, I'm at the barber shop, though." WELLS stated, "Yeah, I'm a call you when I get up to the mall."

89. On January 26, 2019, at approximately 2:23 p.m., WELLS had a conversation with DICKSON on the telephone. WELLS said, "Panera Bread right?" DICKSON said, "Yep, I'm walking through the parking lot right now." WELLS said, "Alright, that is where I'm at, Panera Bread." DICKSON said, "I see your guys' truck."

90. On January 26, 2019, at approximately 2:35 p.m., WELLS and DAVIS arrived at Panera Bread parking lot in Strongsville, Ohio, and WELLS conducted a hand-to-hand drug transaction with DICKSON.

91. On January 26, 2019, at approximately 5:13 p.m., WELLS had a conversation with TRUMAN on the telephone. TRUMAN asked, "What's up? Hey, can you bring me three and a half [3.5 grams of heroin/fentanyl] to 105th?" WELLS replied, "Yep."

92. On January 26, 2019, at approximately 8:23 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "You got one on 38th [codename for a heroin/fentanyl customer]." COLLINS said, "38th, ok."

93. On January 26, 2019, at approximately 9:53 p.m., WELLS had a conversation with COLLIER on the telephone. COLLIER asked, "Are you outside?" WELLS stated, "Uh-uh." COLLIER replied, "I don't want to see your friend [WELLS drug associate who had been conducting heroin/fentanyl transactions for him], that s--t [quality of heroin/fentanyl] isn't the same as what you had the other day." WELLS replied, "Stop it." COLLIER stated, "It ain't, I promise you, your s--t [heroin/fentanyl] was like, pink and dark. His [drug associate] is like white ass pink [color of heroin/fentanyl sold], I promise you." WELLS stated, "Alright." COLLIER stated, "It's not. I don't know what he [drug associate] is doing to that, but it's not the same [quality heroin/fentanyl]. RON's [RONELLE DAVIS] not outside?"

94. On January 27, 2019, at approximately 5:15 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "I got three [customers that want heroin/fentanyl] for you." COLLINS said, "Where at?" WELLS said, "Lakewood [GOFORTH], Beth [MAY], and 117th [another heroin/fentanyl customer]." COLLINS said, "117th and Penn Station?" WELLS said, "Yeah."

95. On January 27, 2019, at approximately 5:35 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS said, "Tell Lakewood [GOFORTH] to come out [to purchase heroin/fentanyl]." WELLS said, "Alright."

96. On January 27, 2019, at approximately 5:36 p.m., WELLS had a conversation with GOFORTH. GOFORTH said, "You ready?" WELLS said, "Yeah, come out." GOFORTH said, "Alright, here I come."

97. On January 27, 2019, at approximately 5:53 p.m., WELLS had a conversation with COLLINS. WELLS asked, "What's up?" COLLINS said, "Tell Beth [MAY] to come out."

98. On January 27, 2019, at approximately 5:54 p.m., WELLS had a conversation with MAY on the telephone. WELLS said, "Come out [to purchase heroin/fentanyl from COLLINS]." MAY said, "Alright."

99. On January 27, 2019, at approximately 7:31 p.m., WELLS had a conversation with HRDY on the telephone. HRDY said, "What's up, this is GLORIA. I'm leaving Parma now. Is there any way you can meet me somewhere [to purchase heroin/fentanyl], or you wanna just meet when I get to my house?" WELLS said, "I'll call you in a minute."

100. On January 27, 2019, at approximately 7:32 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "Where you at? Where you want me to send them [HRDY] to?" COLLINS said, "Wherever you would send them to." WELLS said, "58th, I'm going to see how long, that's who is driving, 58th [codename for HRDY]. . . . They driving though, so where do you want me to send them?" COLLINS stated, "Oh, 58th driving." WELLS stated, "Yeah, they coming from Parma." COLLINS said, "Penn Station." WELLS said, "On 117th." COLLINS stated, "Yeah."

101. On January 27, 2019, at approximately 7:33 p.m., WELLS had a conversation with HRDY on the telephone. WELLS said, "Yeah go to Penn Station on 117th." HRDY said, "Alright, I'll be there in about fifteen minutes." WELLS said, "Alright."

102. On January 27, 2019, at approximately 8:29 p.m., WELLS had a conversation with MOORE on the telephone. MOORE said, "Hello, I have 200 dollars [to purchase heroin/fentanyl]." WELLS said, "Alright, I'll call you in a couple minutes."

103. On January 28, 2019, at approximately 10:35 a.m., WELLS had a conversation with DAVIS on the telephone. WELLS stated, "Where you at?" DAVIS replied, "Just came out on the freeway." WELLS stated, "Alright."

104. On January 28, 2019, at approximately 10:46 a.m., WELLS had a conversation with DAVIS on the telephone. WELLS stated, "Yeah, stop by Lakewood [GOFORTH] too." DAVIS stated, "Alright."

105. On January 28, 2019, at approximately 6:07 p.m., WELLS had a conversation with MOORE on the telephone. MOORE said, "I need you to tell me where to f--king go, I'm sick." Later in the conversation, MOORE stated, "I have two hundred [\$200 to purchase heroin/fentanyl]." WELLS said, "Dave and Buster's." MOORE said, "Alright."

106. On January 28, 2019, at approximately 6:15 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I'm on Snow [Road], I need two [grams of heroin/fentanyl], where you at?" WELLS said, "Dave and Buster's."

107. On January 28, 2019, at approximately 6:17 p.m., WELLS had a conversation with DICKSON on the telephone. WELLS stated, "Go to Penn Station at 117th." DICKSON said, "Alright."

108. On January 28, 2019, at approximately 6:15 p.m., WELLS had a conversation with MOORE on the telephone. WELLS stated, "Go to 117th, Penn Station." MOORE stated, "I'll be there in, like, five minutes."

109. On January 28, 2019, at approximately 6:30 p.m., DICKSON arrived at the Penn Station parking lot, located in Cleveland, Ohio, WELLS conducted separate hand-to-hand transactions with both MOORE and DICKSON.

110. On January 28, 2019, at approximately 6:29 p.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH said, "I need one and a half [grams of heroin/fentanyl]." WELLS said, "Alright."

111. On January 28, 2019, at approximately 7:40 p.m., WELLS had a conversation with MEDLIK on the telephone. MEDLIK said, "I'm here, I'm parked in the white van, I need two [grams of heroin/fentanyl]." Later in the conversation, WELLS said, "Go to Applebee's on Ridge, if you ain't right there, man, I'm gone." MEDLIK said, "Alright."

112. On January 28, 2019, at approximately 7:41 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "They [drug customers] don't know where they at, so I sent them to motherf--king Applebee's on Ridge." COLLINS said, "Applebee's on Ridge, alright."

113. On January 28, 2019, at approximately 8:16 p.m., MEDLIK arrived at the Applebee's parking lot on Ridge Road in Brooklyn, Ohio, in the passenger seat of a white van. Moments later, COLLINS' Ford Fusion, drove through the Applebee's parking lot and stopped. MEDLIK approached the driver's side window and conduct a hand-to-transaction with COLLINS.

114. On January 29, 2019, at approximately 5:17 p.m., WELLS had a conversation with LEE on the telephone. LEE said, "Can you bring me three [grams of heroin/fentanyl] of them to 105th [Street]?" WELLS stated, "Alright."

115. On January 29, 2019, at approximately 5:28 p.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH said, "You forget about me? I'm at Penn Station, and you got like three people here." WELLS asked, "What you wanted?" GOFORTH said, "One and a half [grams of heroin/fentanyl]. It's like four people, your peoples all up here waiting too [WELLS has four other heroin/fentanyl customers waiting at Penn Station to purchase heroin/fentanyl]."

116. On January 29, 2019, at approximately 5:58 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I just got up to Penn [Penn Station meeting location], I need one and a half [grams of heroin/fentanyl]." WELLS stated, "Go to West 140th. The next exit." DICKSON stated, "I'll shoot over there."

117. On January 29, 2019, at approximately 6:05 p.m., DICKSON sent a text message to WELLS' telephone which read, "I'm on Athens [Street], [driving a] Lexus Truck."

118. On January 30, 2019, at approximately 4:46 p.m., WELLS had a conversation with LEE. WELLS asked, "What you wanted?" LEE said, "Two and a half [grams of heroin/fentanyl]." WELLS said, "Alright."

119. On January 30, 2019, at approximately 7:31 p.m., WELLS had a conversation with MOORE on the telephone. MOORE asked, "Can you meet me now? I got two hundred [\$200 to purchase heroin/fentanyl]." WELLS said, "Go to Auto Zone on 117th."

120. On January 30, 2019, at approximately 8:08 p.m., MOORE arrived at the Auto Zone on 117th Street in Cleveland, Ohio, driving a white Buick. MOORE met with WELLS, who was driving DAVIS' Toyota SUV, and conducted a hand-to-hand transaction.

121. On January 31, 2019, at approximately 4:20 p.m., WELLS had a conversation with TRUMAN on the telephone. TRUMAN said, "You can bring me three and a half [grams of heroin/fentanyl] to 105th [Street]?" WELLS said, "Alright."

122. On January 31, 2019, at approximately 6:12 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I need two [grams of heroin/fentanyl], where you at?" WELLS said, "Call me when you get on 117th [Street]." DICKSON said, "117th? Alright."

123. On January 31, 2019, at approximately 6:25 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "I have another one [heroin/fentanyl customer] on at Denny's, they ain't going to Penn Station, they going to Denny's." COLLINS said, "Denny's, alright."

124. On January 31, 2019, at approximately 6:28 p.m., WELLS received a text message from DICKSON which read, "At Denny's [waiting on COLLINS to deliver heroin/fentanyl]."

125. On January 31, 2019, at approximately 6:41 p.m., WELLS had a conversation with MEDLIK on the telephone. MEDLIK stated, "I need one and a half [1.5 grams of heroin/fentanyl], but I don't have a ride. I'm on 105th in between Madison and Western." WELLS stated, "Alright, I'll call you in a minute [to arrange drug deal]."

126. On January 31, 2019, at approximately 6:42 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS stated, "Yeah, where you goin' to after that?" COLLINS stated, "38th, I'm about to pull up at Denny's [to conduct the heroin/fentanyl sale to DICKSON]." WELLS replied, "Alright, and then I got another one [customer for COLLINS to complete] on Western on 105 on the other end [heroin/fentanyl sale with MEDLIK]."

127. On January 31, 2019, at approximately 6:52 p.m., MEDLIK sent a text message to WELLS' telephone stating, "[XXXX] west 105th street Cleveland Ohio [meet location for drug deal]."

128. On January 31, 2019, at approximately 7:08 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS stated, "38th [location for heroin/fentanyl deal]." WELLS stated, "Alright."

129. On February 2, 2019, at approximately 11:43 a.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH stated, "Make it three [grams of heroin/fentanyl]." WELLS replied, "Alright, I'm about to be pulling up, be looking out." GOFORTH replied, "Alright,"

130. On February 2, 2019, at approximately 5:32 p.m., WELLS had a conversation with GALLAGHER on the telephone. WELLS stated, "Alright, I'm about to come through." GALLAGHER stated, "Okay, you got ten [10 grams of heroin/fentanyl]? Want me, ah, just get them [heroin/fentanyl] while you're stopping by then." WELLS replied, "Yeah, yup."

131. On February 2, 2019, at approximately 5:33 p.m., WELLS had a conversation with LASHAUN MONCRIEF on the telephone. WELLS stated, "How they get that? You all had a hostage or something?" MONCRIEF stated, "No, umm, Aaron's little hoes stole some money from these and the hoes got beat up called the police and s--t." WELLS stated, "Hot as f--k, man [caught attention of law enforcement]. You all hot as f--k. You all didn't go out last night?" Later in the conversation, WELLS stated, "I ain't, I ain't f--king with them people right there. I will, I'm stick, man [unintelligible] staying out of the way [under the radar of law enforcement], got to get my face off of things [avoiding interaction with law enforcement]." MONCRIEF stated, "Oh yeah, I need some brown [heroin/fentanyl], cuz." WELLS stated, "The

s--t I got?" MONCRIEF replied, "Hell yeah." WELLS stated, "Aight, don't pull tight on, uh, pull tight up on me before I make it [mix heroin/fentanyl with cutting agent]." MONCRIEF stated, "Alright, I got a play right now [heroin/fentanyl customer], s--t, I was just trying to see, but like ain't nobody pulling up though." WELLS stated, "You know they ain't coming around Harvard, boy." MONCRIEF stated, "You feel me?" WELLS stated, "Right. I'm going to put something together for you later today [heroin/fentanyl supply], call me if you get a ride or something to the Steelyard, I'll meet you down there or something."

132. On February 3, 2019, at approximately 12:11 p.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH stated, "You ready?" WELLS replied, "Yeah, be looking out." GOFORTH replied, "I need three [grams of heroin/fentanyl]." WELLS replied, "Alright."

133. On February 3, 2019, at approximately 3:58 p.m., DAVIS, who was using WELLS' telephone, had a conversation with RONNIE EDGELL on the telephone. EDGELL stated, "My old lady's sons, wife, she gets it [heroin/fentanyl supply] from I think your dude Q, your brother, or something." DAVIS stated, "Yeah." EDGELL continued, "But she OD'd [overdosed on heroin/fentanyl], and the cops found something on her at the hospital. You know, they're gonna give her, tell her to work with somebody [cooperate with police], tell him not to f--k with her [sell her drugs], then no more. 'Cause I, you know, I don't want, I don't want her to try and set nobody up [assist police in identifying heroin/fentanyl dealers], you know, 'cause I think the bitch would." DAVIS said, "Right, I got you."

134. On February 4, 2019, at approximately 1:28 p.m., DAVIS, using WELLS' telephone, had a conversation with MAY on the telephone. MAY stated, "Hey, what's up? Hey

it's Beth. I'm at Tia's house. She wants three [three grams of heroin/fentanyl] and I want two [two grams of heroin/fentanyl]." DAVIS stated, "Alright, here I come."

135. On February 4, 2019, at approximately 5:45 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS said, "Just checking on you, said they had an APB [police lookout] out on you." WELLS said, "Hell naw, I'm out the way." Later in the conversation, WELLS said, "We seen all three of them, bruh, together. How me and RON [RONELLE DAVIS] caught the Durango and the gold car and the big truck. . . . I'm going to be switching out man, it's those f--king plazas, bruh. We can't go into no plazas, side streets. . . . Keep your head up, man." COLLINS said, "Alright."

136. On February 5, 2019, at approximately 12:09 p.m., WELLS had a conversation with MEDLIK on the telephone. MEDLIK said, "Hey its MOLLY [MEDLIK], I'm on 105th between Western and Madison. I need one [gram of heroin/fentanyl]." WELLS said, "Alright, I'll call you."

137. On February 5, 2019, at approximately 1:00 p.m., WELLS had a conversation with MATTHEW KUCERA on the telephone. KUCERA said, "Glad you got in touch with me. You wouldn't come this way for a forty [\$40 worth of heroin/fentanyl], would you?" WELLS stated, "Where you at?" KUCERA asked, "You remember where I live, or no?" WELLS said, "Yep." KUCERA said, "I'll be walking down the street on Hamstead. I'll text you the street. I'll be walking down a different street than mine. It's right before my street." WELLS said, "Yeah, I remember."

138. On February 5, 2019, at approximately 1:03 p.m., WELLS and KUCERA had a text message conversation on the telephone. KUCERA texted, "Hampstead, I will be walking.

Hook it up and I will send people your way [if WELLS' heroin/fentanyl is good quality, KUCERA will bring WELLS more heroin/fentanyl customers]." WELLS said, "Ok."

139. On February 5, 2019, at approximately 1:58 p.m., KUCERA and WELLS had a text message conversation on the telephone. KUCERA texted, "Not bad at all [KUCERA liked WELLS heroin/fentanyl]." WELLS texted, "Wat yo sis numb on 130 [WELLS wants KUCERA's sister's telephone number to sell her heroin/fentanyl]?" KUCERA texted, "Just tried calling her. Give me a minute and let me talk to her first. Don't want to f--k her up if she was getting clean. Haven't talked to her for a minute but last time I did she was trying to better herself. Jimmy call you?"

140. On February 7, 2019, at approximately 9:36 a.m., WELLS had a conversation with MONCRIEF on the telephone. During the conversation, WELLS stated, "What up, cuz, you called?" MONCRIEF stated, "Yeah, hell yeah." WELLS asked, "What's going on?" MONCRIEF said, "Ah, s---t, I was seeing what's up with you, though." WELLS responded, "I'm still in the house. I don't be coming out till, like, one o'clock." MONCRIEF stated, "Right." WELLS stated, "Hot out there. It's hot. Lay low." MONCRIEF stated, "S---t, when you come out, bring them Gs [grams of heroin/fentanyl] for me." WELLS stated, "Alright."

141. On February 7, 2019, at approximately 1:42 p.m., WELLS had a conversation with MEDLIK on the telephone. MEDLIK said, "Hey, it's MOLLY, did you get my text last night about my cousin wanting to go through you [purchase heroin/fentanyl from WELLS]? I need one [gram of heroin/fentanyl], and I'm on 105th but my cousin Katie wanted to know if she can go through your [purchase heroin/fentanyl from WELLS] if that's okay?" WELLS said, "Yeah." MEDLIK said, "I gave her your number, and I sent you her number, but I will text it to you again. Her name is Katie. She is cool, she is legit." WELLS said, "Text it to me."

MEDLIK said, "But if she wants to meet you first, go to her first because she is probably sick."

WELLS said, "Call her and tell her to call me."

142. On February 7, 2019, at approximately 6:48 p.m., WELLS had a conversation with MONCRIEF on the telephone. During the conversation, MONCRIEF asked, "Hey, you still want me to go to the Steelyard, or you want me to come on the west?" WELLS responded, "Yeah, Steelyard." MONCRIEF stated, "I'm about to head there right now." WELLS stated, "Alright."

143. On February 7, 2019, at approximately 7:21 p.m., WELLS had a conversation with MONCRIEF on the telephone. During the conversation, MONCRIEF told WELLS that he dropped something in WELLS' car.

144. On February 7, 2019, at approximately 8:30 p.m., WELLS had a conversation with MONCRIEF on the telephone. During the conversation, WELLS stated, "I'm about to send one [customer] to the Steelyard place." MONCRIEF stated, "Alright, what they wanted?" WELLS stated, "One [gram of heroin/fentanyl]."

145. On February 7, 2019, at approximately 9:31 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "I told them [customers] to go to Steak and Shake. They are in a red car." COLLINS said, "Alright."

146. On February 8, 2019, at approximately 1:19 p.m., WELLS had a conversation with GALLAGHER on the telephone. GALLAGHER said, "Can I get ten [10 grams of heroin/fentanyl]?" WELLS said, "Yeah."

147. On February 10, 2019, at approximately 3:55 p.m., WELLS and KUCERA had a text message conversation on the telephone. KUCERA texted, "You have any of that tan stuff [heroin/fentanyl], and if so, how much for one and a half [1.5 grams of heroin/fentanyl]. Not

really interested in the red stuff [other quality of heroin/fentanyl].” WELLS texted, “Yea, 100 [\$100 per gram].” KUCERA texted, “I have 80.” WELLS texted, “Gotta have 90 at least.” KUCERA texted, “Got it. Let me know if you can swing by [XXXX] Albertly [Avenue, Parma, Ohio]? Yellow house.” WELLS texted, “10 minutes.” KUCERA texted, “Okay.”

148. On February 11, 2019, at approximately 11:03 a.m., IMANI NICHOLSON, using WELLS’ telephone, had a conversation with EDGELL. NICHOLSON said, “He said, ‘Get ready to come outside.’” EDGELL said, “As soon as he gets here, I’m right here by the door.”

149. On February 11, 2019, at approximately 11:04 a.m., DAVIS’ Toyota SUV arrived at EDGELL’s residence, on West 23rd Street in Cleveland, Ohio, and EDGELL conducted a hand-to-hand transaction with the driver of the Toyota SUV.

150. On February 11, 2019, at approximately 3:28 p.m., NICHOLSON, using WELLS’ telephone, had a conversation with TRUMAN on the telephone. NICHOLSON asked, “He [WELLS] said, ‘What you want?’” TRUMAN said, “Three of them [grams of heroin/fentanyl], on 105th [Street].” NICHOLSON said, “Three on 105th, alright.”

151. On February 11, 2019, at approximately 4:30 p.m., NICHOLSON, using WELLS’ telephone, had a conversation with HRDY on the telephone. NICHOLSON said, “He said, ‘What you want,’ he is at the phone?” HRDY said, “A gram to my house, please.” NICHOLSON said, “A gram and a half.” HRDY responded, “No. Just a gram.”

152. On February 11, 2019, at approximately 4:39 p.m., NICHOLSON, using WELLS’ telephone, had a conversation with HRDY on the telephone. NICHOLSON said, “He said come out.” HRDY said, “Alright.”

153. On February 11, 2019, at approximately 4:39 p.m., DAVIS' Toyota SUV, pulled up in front of HRDY's residence on Tillman Avenue in Cleveland, Ohio. HRDY came out of her residence and conducted a hand-to-hand transaction with the driver of the vehicle.

154. On February 11, 2019, at approximately 7:50 p.m., WELLS had a conversation with MONCRIEF on the telephone. WELLS said, "What the f--k, everybody says you let the n--a take the gun from you." MONCRIEF said, "Man, I don't let nobody take no gun, cuz. The house I been in and s--t, the hoe, I was severing her some weed and s--t. I be in her house, the police pull up, don't ride with that s--t, so I left it [gun] in there with her. This hoe get drunk, and this n---a went over and steal my s--t [gun]." WELLS said, "Now you have to chase him down for the gun." MONCRIEF said, "N---a, said you ain't getting it back. Don't worry, I got a gun on me, I'm going to get my other gun." WELLS said, "You have to be a gangster, you suppose to learn from me, you feel what I'm saying." Later in the conversation, WELLS said, "My gun is me, this s--t a part of me. I'm going to take this s--t to my momma's house so nobody can steal my s--t."

155. On February 12, 2019, at approximately 4:25 p.m., WELLS and COLLIER had a text message conversation on the telephone. COLLIER texted, "I'm not making anything can u please throw me a half [gram of heroin/fentanyl] for bring u the business [COLLIER is bringing customers to WELLS]."

156. On February 12, 2019, at approximately 6:14 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "Getting on the highway in Strongsville right now, I need two [grams of heroin/fentanyl]." WELLS said, "Alright, Steelyard."

157. On February 12, 2019, at approximately 6:31 p.m., WELLS had a conversation with DICKSON on the telephone. WELLS said, "Where you parked?" DICKSON said, "I'm at Steak and Shake. I'm inside changing the baby right now."

158. On February 13, 2019, at approximately 11:38 a.m., WELLS had a conversation with GALLAGHER on the telephone. GALLAGHER said, "Hey, can I see you, can I get ten [grams of heroin/fentanyl]." WELLS said, "Alright."

159. On February 13, 2019, at approximately 11:49 a.m., WELLS had a conversation with GALLAGHER on the telephone. WELLS said, "Be looking out." GALLAGHER said, "Alright, bye."

160. On February 13, 2019, at approximately 11:49 a.m., DAVIS' Toyota arrived at a residence on Puritas Avenue in Cleveland, Ohio. GALLAGHER came out of the residence and conducted a hand-to-hand transaction with WELLS.

161. On February 15, 2019, at approximately 11:53 a.m., WELLS had a conversation with DAVIS on the telephone. WELLS said, "Lakewood, two [grams of heroin/fentanyl to GOFORTH]." DAVIS said, "Alright, tell them to come out."

162. On February 15, 2019, at approximately 12:54 p.m., WELLS had a conversation with COLLIER on the telephone. COLLIER said, "I'm here." WELLS said, "I'm about to pull up, have your money ready, have the money ready."

163. On February 15, 2019, at approximately 12:55 p.m., COLLIER sent a text message to WELLS on the telephone. COLLIER texted, "Need two half [grams of heroin/fentanyl], one whole [gram of heroin/fentanyl]."

164. On February 16, 2019, at approximately 11:47 a.m., WELLS had a conversation with GALES on the telephone. WELLS said, "Call me when you get in the car, check my

phones [for calls from heroin/fentanyl customers]." GALES said, "I'm about to hop in right now. You want me to call them back [WELLS' drug customers], tell them you on the way [to sell them heroin/fentanyl]?" WELLS said, "Tell everyone 'five minutes.'" GALES said, "Alright."

165. On February 17, 2019, at approximately 2:51 p.m., WELLS had a conversation with EDGELL on the telephone. EDGELL said, "I just wanted to let you know, this is twenty six and a half [26.5 grams of heroin/fentanyl], plus all the baggie weights, you got a half and twenty six in there, I was looking to see if there were some twos [gram bags] but there weren't." WELLS said, "Alright."

166. On February 17, 2019, at approximately 4:54 p.m., WELLS had a conversation with GOFORTH on the telephone. WELLS asked, "How much money you all got?" GOFORTH said, "The whole seventy [\$70]." WELLS said, "I ain't got no halves [1/2 grams of heroin/fentanyl weighed out], you got a hundred dollars?" GOFORTH said, "No, if you do two [grams of heroin/fentanyl], I'll give it to you next time you come, I [GOFORTH] have people [GOFORTH's heroin/fentanyl customers] waiting for me at my house."

167. On February 19, 2019, at approximately 10:02 a.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH said, "One and a half [grams of heroin/fentanyl]." WELLS said, "Alright, I'll call you in a minute."

168. On February 19, 2019, at approximately 7:45 p.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH said, "Yo, three [grams of heroin/fentanyl]." WELLS said, "I'll call you in a minute."

169. On February 19, 2019, at approximately 8:10 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS said, "Tell Lakewood [GOFORTH] to come out." WELLS said, "Alright."

170. On February 21, 2019, at approximately 1:21 p.m., WELLS had a conversation with MEDLIK on the telephone. WELLS instructed MEDLIK to go to Buffalo Wild Wings to conduct the drug transaction.

171. On February 21, 2019, at approximately 1:31 p.m., WELLS had a conversation with MEDLIK on the telephone. WELLS said, "Yeah, I am here." MEDLIK said, "I am going to park, I am in a black car."

172. On February 22, 2019, at approximately 12:20 p.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH said, "Hey, just telling, because I look out for you, because I do like you guys. MOLLY [MEDLIK], don't talk to her right now. She has two people she is working with [heroin/fentanyl customers] that everywhere she goes, police are right behind her. So I need to watch out for you, 'cause I was informed you deal with her [MOLLY MEDLIK], and I don't need you caught up in her s--t." WELLS said, "Somebody else had called me this morning, like, 'S--t we ain't dealing with her no more.'" GOFORTH said, "She is giving your number out to that dude Kirk. She is giving your number out to random people. Just watch her." WELLS said, "Thanks."

173. On February 22, 2019, at approximately 2:33 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "Could you shoot out to me, I need three [grams of heroin/fentanyl], I'm stuck." WELLS said, "Southpark Mall." DICKSON said, "I can't even make it there. I have no car. I still need that three from the other day." WELLS said, "Send me your address." DICKSON said, "Alright brother."

174. On February 23, 2019, at approximately 12:08 p.m., WELLS had a conversation with MAY on the telephone. MAY said, "I need two [grams of heroin/fentanyl]." WELLS said, "Alright, here I come."

175. On February 23, 2019, at approximately 2:34 p.m., DICKSON sent a text message to WELLS' telephone stating, "[XXX] West Drive, Brunswick, Ohio."

176. On February 23, 2019, at approximately 12:36 p.m., WELLS had a conversation with MONCRIEF on the telephone. During the conversation MONCRIEF asked, "You still got some of that one s--t [heroin/fentanyl to sell]? I never got none of that s--t." WELLS said, "Got that right now."

177. On February 23, 2019, at 2:15 p.m., WELLS had a conversation with LEE on the telephone. LEE asked, "Can you bring me two of them [grams of heroin/fentanyl] to 105th [Street]?" WELLS said, "Alright."

178. On February 24, 2019, at approximately 12:11 p.m., WELLS had a conversation with GALLAGHER. WELLS stated, "What up, Liz?" GALLAGHER said, "Hey, can I get ten [grams of heroin/fentanyl]." WELLS said, "Alright."

179. On February 25, 2019, at approximately 10:08 a.m., DAVIS had a conversation with MAY on the telephone. MAY stated, "Yeah, I need two [two grams of heroin/fentanyl]." DAVIS stated, "Alright." MAY replied, "Hey, do you have the pink stuff [type of heroin/fentanyl]." DAVIS replied, "Uh uh [no]." MAY replied, "Alright, that's cool, but still come on [meet me for drug deal anyway]."

180. On February 25, 2019, at approximately 10:29 a.m., DAVIS had a conversation with TAMIE SEITZ on the telephone. SEITZ said, "I'm running up to 140th and Brookpark [Road] real quick, just to get this little bit of money, because I need something [heroin/fentanyl]"

to get right, and then I need to go get my real money. Can I see you after that [to purchase heroin/fentanyl]?” DAVIS said, “Yeah.” SEITZ said, “I got my dude [heroin/fentanyl customer] in Ashland. You know what you have to tell people, you know the white yellowish stuff [type of heroin/fentanyl WELLS and DAVIS are selling], make sure you tell them [customers] not to do a lot, because you only need half [heroin/fentanyl is potent]. I’m fifty, I have been doing this [using heroin/fentanyl] for thirty years.” DAVIS said, “Let me call you right back.”

181. On February 25, 2019, at approximately 10:39 a.m., DAVIS, using WELLS’ telephone, had a conversation with SEITZ on the telephone. SEITZ said, “I’m on Brookpark between 130th and 140th.” DAVIS said, “Go to Bob Evans on Brookpark.” SEITZ said, “Bob Evans, ok. I’ll be there in two seconds.” DAVIS asked, “What you want?” SEITZ said, “I only have enough for half [gram of heroin/fentanyl] right now. Let me talk to you for a minute. Make sure, especially if you got newbies [new heroin/fentanyl customers] or something, you tell them only do a f—kin’ tiny, tiny little bit [of heroin/fentanyl], and see where their tolerance is, ‘cause otherwise you are going to have bodies [people overdosing and dying], dude, I’m not kidding, this s--t [heroin/fentanyl WELLS and DAVIS are selling] is that good. You hear me, I don’t want you two having that on you. No bodies, ain’t no money. These young kids out here have balls and no loyalty.” DAVIS said, “Go to the back.”

182. On February 25, 2019, at approximately 3:16 p.m., WELLS had a conversation with SEITZ on the telephone. SEITZ said, “Can I see you for two of them [grams of heroin/fentanyl]?” WELLS said, “Go to Ridge [Road], Saver’s.” SEITZ said, “Alright.” SEITZ said, “This guy is sitting right next to us staring at us, so I am going to move.” WELLS said, “Go to Denny’s.”

183. On February 25, 2019, at approximately 3:45 p.m., WELLS had a conversation with KUCERA on the telephone. KUCERA said, "Jimmy is coming to scoop me up, I need, like, three and a half or four [grams of heroin/fentanyl]. He is coming, he will be here in ten minutes. Which way should I head?" WELLS said, "Bob Evans, 140th by Big Boys." KUCERA said, "I'll be there in ten minutes. I'm in Jim's dump truck."

184. On February 25, 2019, at approximately 3:45 p.m., KUCERA arrived in a dump truck at Bob Evans in Cleveland, Ohio. KUCERA got out of the truck and walked into a nearby gas station. Moments later, DAVIS and WELLS arrived in DAVIS' Toyota SUV and parked next to the dump truck. WELLS conducted a hand-to-hand transaction with the person in the truck. Moments later, KUCERA walked back to the dump truck and the truck drove away.

185. On February 27, 2019, at approximately 10:25 a.m., WELLS had a conversation with SEITZ on the telephone. SEITZ said, "I need a full one [gram of heroin/fentanyl]. Can you come to my house, or am I going to have to meet you?" WELLS said, "Yeah. Where you stay at?" SEITZ said, "Ok, well my dude's on his way. He will be at my house in fifteen minutes. My address is [XXXX] West 130th."

186. On February 27, 2019, at approximately 3:19 p.m., DAVIS, using WELLS' telephone, had a conversation with SEITZ on the telephone. SEITZ said, "Can I see you for a full one [gram of heroin/fentanyl]?" DAVIS said, "Alright, here I come." SEITZ asked, "Is it still the pink [high quality heroin/fentanyl]?" DAVIS said, "Yeah." SEITZ said, "Good, 'cause I like that."

187. On February 27, 2019, at approximately 3:54 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I need three [grams of heroin/fentanyl]."

I'm stuck at my house, can you shoot out?" WELLS said, "Send me the address." DICKSON said, "Alright."

188. On February 27, 2019, at approximately 8:04 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "I got one for you on 58th for the two [grams of heroin/fentanyl to HRDY]." COLLINS said, "Alright."

189. On February 28, 2019, at approximately 8:50 a.m., WELLS had a conversation with KUCERA on the telephone. KUCERA said, "I need a whole one [gram of heroin/fentanyl], if you could drop it off?" WELLS said, "Alright, give me a couple of minutes, I am about to drop my kids off." KUCERA said, "Alright, is it the red stuff [good quality heroin/fentanyl]?" WELLS said, "Yeah, I got the red stuff."

190. On February 28, 2019, at approximately 11:12 a.m., WELLS had a conversation with COLLIER on the telephone. COLLIER said, "WILL, this is SHAUNNA, hey, that number I was calling on a week or so ago, that 825 number. I don't know if that n---a hit you up and tried to see you guys [purchase heroin/fentanyl from you], his name Los. Don't f--k with him, he got locked up and s--t last night, and they are all out [and cooperating with law enforcement]." WELLS said, "Alright."

191. On March 1, 2019, at approximately 12:02 p.m., DAVIS, using WELLS' telephone, had a conversation with GOFORTH on the telephone. DAVIS stated, "Get ready to come out." GOFORTH stated, "I'm going to come outside and then you'll see where I'm at, and then there's an alley right next to my house . . . I need three [grams of heroin/fentanyl]." DAVIS stated, "Alright." GOFORTH stated, "Alright, I'm coming down right now."

192. On March 1, 2019, at approximately 1:06 p.m., DAVIS had a conversation with KUCERA on the telephone. KUCERA said, "Do you have that red stuff [high quality

heroin/fentanyl] still? I need four [grams] of them.” DAVIS said, “I’m at BW3s.” KUCERA said, “I’ll let you know if we can make it over there, I’m in Jimmy’s truck.”

193. On March 1, 2019, at approximately 1:27 p.m., KUCERA arrived at BW3s in Cleveland, Ohio, in a white pick-up truck and conducted a hand-to-hand heroin/fentanyl deal with WELLS and DAVIS who were driving in DAVIS’ Toyota SUV.

194. On March 1, 2019, at approximately 1:34 p.m., GOFORTH and BOBBI BOYLAN sold heroin/fentanyl to a person with the initials T.M. in Cleveland, Ohio. T.M. used the heroin/fentanyl and overdosed.

195. On March 1, 2019, at approximately 7:45 p.m., WELLS had a conversation with GALLAGHER on the telephone. GALLAGHER said, “Can I get ten [grams of heroin/fentanyl]?” WELLS said, “Yeah, I’ll call you in a minute.”

196. On March 2, 2019, at approximately 10:09 a.m., WELLS had a conversation with MAY on the telephone. MAY asked, “Hey, I need two and a half [grams of heroin/fentanyl].” WELLS said, “Alright, I’m getting up now. I have a hangover. I’m on my way, alright.”

197. On March 2, 2019, at approximately 11:09 a.m., WELLS had a conversation with SEITZ on the telephone. WELLS said, “Give me like seven minutes.” SEITZ said, “Kurt also, you know Matt’s friend Kurt? Can I give him your number? ‘Cause Matt for some reason doesn’t like giving out numbers, because he [Matt] wants to keep it for himself. But he [Kurt] asked me if he could get your number?” WELLS said, “Yeah.” SEITZ said, “Because he is coming in from, he lives far away, and it will take him forty five minutes. And he [Kurt] asked if it was still the same, the pink [high quality heroin/fentanyl], and I told him ‘yes.’” WELLS said, “Yeah. What you want?” SEITZ said, “Two [grams of heroin/fentanyl].” WELLS said, “Be looking out, be outside, and have the money ready.”

198. On March 2, 2019, at approximately 1:23 p.m., WELLS and DICKSON had a text message conversation on the telephone. DICKSON texted, "Wya [Where you at]? Need 2 [grams of heroin/fentanyl] I'm getting on the freeway. Need 2 [grams of heroin/fentanyl]. Michelle [DICKSON's wife] with me that's why I text." WELLS texted, "Ok." DICKSON texted, "I'm by Bagley rt [right] now. Way [where you at]."

199. On March 3, 2019, at approximately 10:00 a.m., WELLS had a conversation with KUCERA on the telephone. KUCERA said, "You around?" WELLS said, "Yeah, I'm about to get up in a couple of minutes." KUCERA said, "Yeah I need three [grams] of them, if you got that red stuff still?" WELLS said, "Yeah."

200. On March 3, 2019, at approximately 11:58 a.m., WELLS received a text from KUCERA on the telephone. KUCERA texted, "2 and a half [grams of heroin/fentanyl]. This dude is an idiot I am with that Kurt dude."

201. On March 3, 2019, at approximately 12:13 p.m., WELLS had a conversation with KUCERA on the telephone. KUCERA said, "Hey, I am on the back side of Home Depot. I want two and a half [grams of heroin]. I'm in a blue Dodge." WELLS said, "Yeah, I got you, I see you."

202. On March 3, 2019, at approximately 12:13 p.m., WELLS arrived at the Home Depot in Cleveland, Ohio, in DAVIS' Toyota SUV and met with KUCERA, who was driving a blue Dodge.

203. On March 3, 2019, at approximately 2:13 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "Lakewood [GOFORTH], for real." COLLINS said, "I'm on Madison." WELLS said, "I'll call you in a few minutes and tell you where to go."

204. On March 3, 2019, at approximately 4:18 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS said, "Where you at? Let me get a dime till tomorrow [borrow ten grams of heroin/fentanyl]." WELLS said, "Man, that s--t going to be about, s--t going to be about couple hours. I'm wet, my s--t is wet [WELLS just finished cutting his heroin/fentanyl and it still needs to dry before it can be sold]. I was about to call you and, like, let me get forty [grams] real quick, my s--t wet. Probably like a couple hours or something. Give me like an hour, I'm about to drop these kids off, then I'm about to check it [heroin/fentanyl supply] out." COLLINS said, "Alright."

205. On March 4, 2019, at approximately 9:46 a.m., DAVIS had a conversation with SEITZ on the telephone. SEITZ said, "I was going to see if, like, you could come through for two [grams of heroin/fentanyl]?" DAVIS said, "I just woke up, I'm about to brush my teeth and put on my clothes, already got out of the shower." SEITZ said, "Alright."

206. On March 4, 2019, at approximately 10:00 a.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "I'm coming out, coming out, need to meet me, like, in the Steelyard. Give me like 15 minutes." COLLINS said, "Alright."

207. On March 4, 2019, at approximately 7:16 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "58th [codename for HRDY], Lakewood [codename for GOFORTH]. You know where Lakewood new spot at, right?" COLLINS said, "Naw." WELLS then gave directions to COLLINS for GOFORTH's new address so COLLINS could distribute heroin/fentanyl to GOFORTH.

208. On March 4, 2019, at approximately 7:21 p.m., DICKSON sent a text message to WELLS on the telephone. DICKSON texted, "I need 3 and a half [grams of heroin/fentanyl] but I'm stuck at home. Can you swing by?"

209. On March 4, 2019, at approximately 7:42 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS said, "58th [codename for HRDY]?" WELLS said, "Yeah, then I got one on 38th, too." COLLINS said, "Alright."

210. On March 4, 2019, at approximately 7:43 p.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "I got one [heroin/fentanyl customer] in Brunswick [DICKSON] where we went, you want me to send you the address? You want to go?" COLLINS said, "Yeah, I ain't tripping." WELLS said, "Alright, I'm waiting on him [DICKSON] to call. 38th, 58th [code name for HRDY], Lakewood [code name for LISA GOFORTH]." COLLINS said, "Yeah, I'm on 58th." WELLS said, "They outside then."

211. On March 4, 2019, at approximately 7:58 p.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH said, "You ready?" WELLS said, "Yeah, you have to come to the front, my dude [COLLINS] don't know where you stay at, be standing in the front." GOFORTH said, "Gold car?" WELLS said, "Yeah."

212. On March 4, 2019, at approximately 7:58 p.m., COLLINS, driving a gold Ford Fusion, arrived at a residence on Bosworth Drive in Cleveland, Ohio. GOFORTH came out of the residence on Bosworth, approached COLLINS' vehicle, and conducted a hand-to-hand transaction with COLLINS.

213. On March 5, 2019, at approximately 10:35 a.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I'm stuck in my house, I was seeing if you could bring me three and a half [grams of heroin/fentanyl]?" WELLS said, "I'll call you in a minute."

214. On March 5, 2019, at approximately 12:31 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I'm leaving Strongsville." WELLS said, "Come

to Ridge [Road]. Hurry up. What you want?" DICKSON said, "Three [grams of heroin/fentanyl], the same thing." WELLS said, "Hurry up."

215. On March 6, 2019, at approximately 12:53 p.m., WELLS had a conversation with SEITZ on the telephone. SEITZ said, "I am just sitting here waiting for you [to deliver heroin/fentanyl]. I just told Johnny [SEITZ' drug associate] you were here and to go outside." WELLS said, "Give me like three minutes. What you want?" SEITZ said, "Two [grams of heroin/fentanyl]." WELLS said, "Alright."

216. On March 7, 2019, at approximately 10:43 a.m., WELLS had a conversation with DAVIS on the telephone. WELLS said, "I got one in the Rite Aid [WELLS directed a customer to go to Rite Aid]." DAVIS said, "I'm supposed to be hitting your licks on 117th." WELLS said, "Alright."

217. On March 7, 2019, at approximately 12:23 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I'm up by Spring [Road], I need three [grams of heroin/fentanyl]." WELLS said, "Alright, stay on Spring, and to the Spring apartments." DICKSON said, "Ok."

218. On March 7, 2019, at approximately 12:25 p.m., WELLS and DAVIS had a conversation on the telephone. During the conversation, WELLS directed DAVIS where to meet and sell heroin/fentanyl to WELLS' customers. WELLS said, "Where do you want me to send them [heroin/fentanyl customers] to?" DAVIS said, "Where they coming from?" WELLS said, "Springs." DAVIS said, "I'm on Ridge right now, tell them [heroin/fentanyl customers] to stay on Springs." WELLS said, "Then I got Tia [TRUMAN] and them too." DAVIS said, "Where is the lick [heroin/fentanyl customer] at on Springs?" WELLS said, "In the back, I'm about to call them now. In the Ford, car like we had."

219. On March 7, 2019, at approximately 12:49 p.m., WELLS and DAVIS had a conversation on the telephone. DAVIS said, "Tell Tia [TRUMAN] to come outside." WELLS said, "Alright."

220. On March 7, 2019, at approximately 1:06 p.m., WELLS and DAVIS had a conversation on the telephone. DAVIS said, "Tell 58th [HRDY] to come outside."

221. On March 8, 2019, at approximately 12:58 p.m., WELLS had a conversation with HRDY on the telephone. HRDY asked, "What up, where you at?" WELLS said, "Police be over there, man, find a ride." HRDY said, "There ain't no police, I've been outside." WELLS said, "Every time I come over there [HRDY's residence] the same motherf--king grey Durango truck. You don't be watching. You have to find a ride to me." HRDY said, "F--k."

222. On March 8, 2019, at approximately 1:03 p.m., WELLS had a conversation with DICKSON on the telephone. DICKSON said, "I'm at the light pulling into Denny's." WELLS said, "Side street. Go to the side street right there. What you want?" DICKSON said, "One and a half [grams of heroin/fentanyl]."

223. On March 9, 2019, at approximately 9:26 a.m., WELLS had a conversation with GALES on the telephone. WELLS said, "State, State [WELLS directing GALES to a drug customer on State Road]." GALES said, "Alright, I'm still breaking this s--t down [preparing heroin/fentanyl for sale]." WELLS said, "Alright."

224. On March 9, 2019, at approximately 10:31 a.m., WELLS had a conversation with GALES on the telephone. GALES asked, "When I get off on 117th, I'm going right towards Penn Station?" WELLS said, "Opposite way, by that gas station, Gas USA. You are going to bust a left, Bosworth."

225. On March 9, 2019, at approximately 10:37 a.m., WELLS had a conversation with GOFORTH on the telephone. GOFORTH said, "You ready for me?" WELLS said, "Ya, but you got to go in the front. My people [GALES] don't know what where you stay at. Be in the front." GOFORTH said, "Ok, I'm going out front now."

226. On March 9, 2019, at approximately 1:16 p.m., WELLS had a conversation with SEITZ on the telephone. SEITZ said, "Hey, are you coming [to sell me heroin/fentanyl]?" WELLS said, "Ya, but my cousin [GALES who is distributing heroin/fentanyl for WELLS' DTO] don't know where you stay at, and he taking all day." SEITZ said, "Can I come to you?" WELLS said, "Give me like ten minutes."

227. On March 9, 2019, at approximately 4:07 p.m., WELLS had a conversation with GALES on the telephone. WELLS said, "Keep going, like, when you pass the gas station and the police station, you going to see a blue minivan in the driveway on the right hand side. Going to be a white dude waiting outside." GALES said, "Oh, I see it." WELLS said, "He wants two [grams of heroin/fentanyl]." GALES said, "Alright." WELLS said, "Then go to 38th [code name for heroin/fentanyl customer]."

228. On March 9, 2019, at approximately 6:21 p.m., WELLS had a conversation with GALES on the telephone. WELLS said, "Might as well stop by the Steelyard, probably want one and a half. How many Gs [grams] you got together?" GALES said, "Hold on. I have like six seven in them halves [half gram quantities of heroin/fentanyl to sell]." WELLS said, "Alright. Stop by Steelyard, Aldi's. One and a half."

229. On March 10, 2019, at approximately 11:42 a.m., WELLS had a conversation with DAVIS on the telephone. WELLS stated, "Hey, I'm come out in a minute." DAVIS replied, "Nah, I'm 'bout to just, give the bag [heroin/fentanyl to sell] to Trey [GALES] you ain't

got to worry about that s--t [conversation becomes indecipherable]." WELLS continued, "I'm trying to make the road [complete drug deals]."

230. On March 10, 2019, at approximately 12:28 p.m., DAVIS had a conversation with GALES on the telephone. DAVIS said, "I'm bring this bag to you [resupply GALES with heroin/fentanyl]. That is what I was trying to tell you." GALES said, "I'm right here in Shaker about to drop her off, I'm about to come that way." DAVIS said, "Alright."

231. On March 10, 2019, at approximately 1:29 p.m., DAVIS, using WELLS' telephone, had a conversation with GALES on the telephone. DAVIS said, "It should be a white Buick car with tint [DAVIS' heroin/fentanyl customer], that is who gets ten [grams of heroin/fentanyl], and the other one, you know." GALES said, "Ya, ya, 38th [code name for heroin/fentanyl customer]." DAVIS said, "Don't go to 38th just yet. Tell me when you done with them, and I'll tell you where you got to do after that." GALES said, "Alright."

232. On March 10, 2019, at approximately 1:31 p.m., DAVIS had a conversation with SEITZ. SEITZ said, "Can you come through for a full one [gram of heroin/fentanyl]?" DAVIS said, "Alright, got you."

233. On March 10, 2019, at 1:40 p.m., DAVIS, using WELLS' telephone, had a conversation with GALES on the telephone. DAVIS said, "130th by the police station [location where to meet SEITZ]." GALES said, "Alright, yeah, the driveway."

234. On March 10, 2019, at approximately 5:37 p.m., MAY sent a text message to WELLS' phone stating, "Need two [grams of heroin/fentanyl]."

235. On March 10, 2019, at approximately 6:08 p.m., WELLS had a conversation with GALES on the telephone. WELLS stated, "Yeah, where you at, still at dash?" GALES replied, "Yeah, I'm about to be headed back to the west [west side of Cleveland]." WELLS continued,

“Yeah, let me know, I got one [drug delivery heard in previous call] for ya um by Popeye’s.”

GALES stated, “By who?” WELLS stated, “Clark [Road], Popeye’s, Beth [MAY] over there.”

GALES, stated, “Alright, I’mma call you when I leave. I’mma leave out in a minute.”

236. On March 11, 2019, GALES, while driving his gold Ford Fusion in Bedford, Ohio, possessed approximately 9.48 grams of heroin/fentanyl, which was packaged for sale, a loaded Glock 19 handgun, and \$3,782 of drug proceeds.

237. On March 12, 2019, at approximately 7:26 p.m., WELLS had a conversation with HRDY on the telephone. HRDY said, “I need to come grab four [grams of heroin/fentanyl], want me to meet you at Penn Station on 117th?” WELLS said, “Yeah, come on, hurry up.”

238. On March 12, 2019, at approximately 7:42 p.m., WELLS had a conversation with DAVIS on the telephone. WELLS asked, “Hey, where the f--k you put the lil ruler [scale] at in the car?” DAVIS said, “TRAVON [GALES] got that one.” WELLS said, “Oh, alright.”

239. On March 13, 2019, at approximately 12:54 p.m., WELLS had a conversation with DAVIS on the telephone. WELLS said, “Ridge, Applebee’s [location where to meet heroin/fentanyl customers].” DAVIS said, “Alright, I was about to go to Penn Station.”

240. On March 13, 2019, at approximately 7:16 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS said, “They [police presence] out here man, its hot as f--k over here, boy.” WELLS said, “You see them motherf--kers [SEITZ]? They driving, the ones by the police station, they driving now. Where do you want them to go?” COLLINS said, “Police right here, State Troopers out right here.” WELLS said, “Abort mission, it’s over, man, shut it down.”

241. On March 14, 2019, at approximately 10:53 a.m., WELLS had a conversation with LEE. LEE said, "Can you bring me a whole one [gram of heroin] to 105th? WELLS said, "Alright."

242. On March 16, 2019, at approximately 12:51 p.m., WELLS had a conversation with LEE on the telephone. WELLS said, "What up?" LEE said, "Dude, when you come up, you think you can bring me a whole one [gram of heroin/fentanyl] to 105th?" WELLS said "Alright." LEE said, "Alright."

243. On March 18, 2019 at approximately 4:02 p.m., WELLS had a conversation with EDGELL on the telephone. WELLS stated, "What up?" EDGELL replied, "What's up bro? You want to swing by the house?" WELLS replied, "Alright." EDGELL stated, "Alright, bro."

244. On March 20, 2019, at approximately 9:55 a.m., WELLS had a conversation with DAVIS on the telephone. WELLS said, "Carwash [heroin/fentanyl customer is at the carwash]." DAVIS said, "Alright, I'll come out in a minute."

245. On March 24, 2019, at approximately 10:58 a.m., WELLS had a conversation with COLLINS on the telephone. WELLS said, "I'm in route now, getting up now, man. I lost that s--t [supply of heroin/fentanyl], bruh." COLLINS said, "You lost what?" WELLS said, "I put this s--t [heroin/fentanyl supply] in my friend's car, and it's gone, bruh." COLLINS said, "The weed?" WELLS said, "My s--t [heroin/fentanyl supply]." COLLINS said, "Oh, damn." WELLS said, "I need to re-plan my day, bruh [needs to re-supply himself with heroin/fentanyl]."

246. On March 24, 2019, at approximately 6:41 p.m., WELLS had a conversation with COLLINS on the telephone. COLLINS asked, "What is going on?" WELLS said, "I'm working baby, I'm working [preparing heroin/fentanyl for distribution]. Give me a couple of minutes,

man.” COLLINS said, “You keep saying that, I’m dead, man [COLLINS needs heroin/fentanyl to sell].” WELLS said, “I’m trying, bruh, give me a couple of minutes.”

247. On April 3, 2019, COLLINS possessed approximately 10.08 grams of a mixture of heroin, carfentanil, and fentanyl, 2.68 grams of a mixture of heroin, acetylfentanyl, and carfentanil, and 1.77 grams of a mixture of heroin and acetylfentanyl, a scale, a loaded Diamondback, Model DB380, .380, serial number ZB1061, and approximately \$3,300 of drug proceeds, at his residence on Edna Avenue in Cleveland, Ohio.

248. On April 3, 2019, DAVIS possessed a quantity of heroin/fentanyl, a scale, a drug press, drug packaging and processing material, and approximately \$23,034 of drug proceeds at his residence on Sanctuary Lane in Sheffield Village, Ohio.

249. On April 3, 2019, ALQUIN WELLS possessed approximately \$2,970 of drug proceeds.

250. On April 3, 2019, ALQUIN WELLS possessed a FN Herstal Pistol, 5.4 x 28 cal., serial number 386109851; a FN Herstal Pistol, 5.4 x 28 cal., serial number 386139319; a Glock Pistol, Model 34, 9mm, serial number ADFV037, a drug press, and packaging material at his residence on Quail Hollow Lane in Sheffield Village, Ohio.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Distribution of Heroin, Fentanyl, Carfentanil, and Acetylfentanyl,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

251. On or about March 1, 2019, in the Northern District of Ohio, Eastern Division, Defendants LISA GOFORTH and BOBBI BOYLAN did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled

substance, fentanyl, a Schedule II controlled substance, carfentanil, a Schedule II controlled substance and a fentanyl analogue, and acetylfentanyl, a Schedule I controlled substance and a fentanyl analogue, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

ENHANCED PENALTY UNDER TITLE 21,
UNITED STATES CODE, SECTION 841(b)(1)(C)
(Serious Bodily Injury Resulting from Use of Controlled Substance,
21 U.S.C. § 841(b)(1)(C))

252. The allegations of Count 2 are hereby re-alleged and incorporated herein. On or about March 1, 2019, in Cleveland, Ohio, T.M., a person whose identity is known to the grand jury, did ingest and overdose on a controlled substance, namely a mixture of heroin, fentanyl, carfentanil, and acetylfentanyl, which LISA GOFORTH and BOBBI BOYLAN had distributed to T.M.

253. As a result of LISA GOFORTH's and BOBBI BOYLAN's distribution of heroin, fentanyl, carfentanil, and acetylfentanyl, as alleged in Count 2, serious bodily injury did result from the use of heroin and acetylfentanyl, Schedule I controlled substances, and fentanyl and carfentanil, Schedule II controlled substances.

All in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 3
(Possession with Intent to Distribute Heroin and Fentanyl, 21 U.S.C. § 841(a)(1), (b)(1)(C))

The Grand Jury further charges:

254. On or about March 11, 2019, in the Northern District of Ohio, Eastern Division, Defendant TRAVON GALES did knowingly and intentionally possess with intent to distribute approximately 9.48 grams of a mixture and substance containing a detectable amount of heroin, a

Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C § 924(c)(1)(A)(i))

The Grand Jury further charges:

255. On or about March 11, 2019, in the Northern District of Ohio, Eastern Division, Defendant TRAVON GALES did possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, to wit: Possession with Intent to Distribute a Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), as charged in Count 3 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 5

(Possession with Intent to Distribute Heroin, Fentanyl, and Carfentanil, 21 U.S.C. § 841(a)(1), (b)(1)(B))

The Grand Jury further charges:

256. On or about April 3, 2019, in the Northern District of Ohio, Eastern Division, Defendant MALCOLM COLLINS did knowingly and intentionally possess with intent to distribute approximately 12.76 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, fentanyl, a Schedule II controlled substance, and carfentanil, a Schedule II controlled substance and a fentanyl analogue, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B).

COUNT 6

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

257. On or about April 3, 2019, in the Northern District of Ohio, Eastern Division, Defendant MALCOLM COLLINS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, those being: Trafficking in Drugs, Case Number CR-04-448820, in the Cuyahoga County Court of Common Pleas, on or about May 18, 2004, did knowingly possess in and affecting interstate commerce, a firearm, to wit Diamondback, Model DB380, .380, serial number ZB1061, and ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 7

(Possession with Intent to Distribute Heroin and Fentanyl, 21 U.S.C. § 841(a)(1), (b)(1)(C))

The Grand Jury further charges:

258. On or about April 3, 2019, in the Northern District of Ohio, Eastern Division, Defendant RONELLE DAVIS did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT 8

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

259. On or about April 3, 2019, in the Northern District of Ohio, Eastern Division, Defendant ALQUIN WELLS, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Conspiracy to Possess with Intent to Distribute and Distribution of Cocaine Base (Crack), Case Number 1:08-CR-140, in the United

States District Court, Northern District of Ohio, on or about November 19, 2008; and Drug Offenses, Case Number CR-04-450355-ZA, in the Cuyahoga County Court of Common Pleas, on or about July 19, 2004, did knowingly possess in and affecting interstate commerce, three firearms, to wit: a FN Herstal Pistol, 5.4 x 28 cal., serial number 386109851; a FN Herstal Pistol, 5.4 x 28 cal., serial number 386139319; and a Glock Pistol, Model 34, 9mm, serial number ADFV037, and ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 9

(Conspiracy to Launder Monetary Instruments, 18 U.S.C. § 1956(h))

The Grand Jury further charges:

260. The factual allegations in Count 1 are realleged and incorporated by reference as if fully set forth herein.

261. From on or about May 24, 2016 until on or about April 3, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants RONELLE DAVIS and IMANI NICHOLSON did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, to wit, cash deposits into US Bank account X-4910, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds

of some form of unlawful activity, in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Sections 1956(h) and 2.

COUNT 10

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

262. On or about April 3, 2019, in the Northern District of Ohio, Eastern Division, Defendant DEMARCO CLAYTON, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Trafficking Offenses, in the Cuyahoga County Court of Common Pleas, Case Number CR-06-490501 on or about February 9, 2007; Trafficking Offenses, in the Cuyahoga County Court of Common Pleas, Case Number CR-06-479029, on or about December 18, 2006; Drug Possession, in the Cuyahoga County Court of Common Pleas, Case Number CR-06-477147 on or about December 18, 2006; Drug Possession, in the Cuyahoga County Court of Common Pleas, Case Number CR-06-476514, on or about December 18, 2006; Attempted Drug Possession, in the Cuyahoga County Court of Common Pleas, Case Number CR-05-461029, on or about March 17, 2005; Drug Possession, in the Cuyahoga County Court of Common Pleas, Case Number CR-04-454166, on or about March 17, 2005; did knowingly possess in and affecting interstate commerce, a firearms, to wit: a Taurus 38 special revolver, serial number ZG61358, and ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 11

(Possession with Intent to Distribute Heroin, 21 U.S.C. § 841(a)(1), (b)(1)(C))

The Grand Jury further charges:

263. On or about April 3, 2019, in the Northern District of Ohio, Eastern Division, Defendant DEMARCO CLAYTON did knowingly and intentionally possess with intent to distribute approximately a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNTS 12-27

(Use of a Communications Facility to Facilitate a Felony Drug Offense, 21 U.S.C. § 843(b))

The Grand Jury further charges:

264. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Sections 846 and 841(a)(1):

Count	Defendants	Date	Time (EST)
12	ALQUIN WELLS and MALCOLM COLLINS	January 18, 2019	7:03 p.m.
13	RONELLE DAVIS and TRAVON GALES	March 10, 2019	1:29 p.m.
14	RONNIE EDGELL	February 3, 2019	3:58 p.m.
15	LASHAUN MONCRIEF	February 7, 2019	9:36 a.m.
16	AMBER MOORE	January 20, 2019	7:48 p.m.
17	MATTHEW KUCERA	February 10, 2019	3:55 p.m.
18	PATRICIA TRUMAN	January 26, 2019	5:13 p.m.
19	MOLLY MEDLIK	February 7, 2019	1:42 p.m.
20	GLORIA HRDY and IMANI NICHOLSON	February 11, 2019	4:30 p.m.
21	CODY RAY LEE	January 29, 2019	5:17 p.m.
22	LISA GOFORTH	March 1, 2019	12:02 p.m.
23	SHAUNNA COLLIER	February 15, 2019	12:55 p.m.
24	VIRGINIA MAY	February 4, 2019	1:28 p.m.

25	TAMIE SEITZ	March 2, 2019	10:09 a.m.
26	JOHN DICKSON	February 27, 2019	3:54 p.m.
27	ELIZABETH GALLAGHER	March 1, 2019	7:45 p.m.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE

The Grand Jury further charges:

255. The allegations of Counts 1 through 27, inclusive are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 982, Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c). As a result of the foregoing offenses Defendants ALQUIN WELLS, aka WORD, aka WILL, RONELLE DAVIS, MALCOLM COLLINS, TRAVON GALES, RONNIE EDGELL, LASHAUN MONCRIEF, MATTHEW KUCERA, AMBER MOORE, GLORIA HRDY, PATRICIA TRUMAN, MOLLY MEDLIK, CODY RAY LEE, LISA GOFORTH, SHAUNNA COLLIER, VIRGINIA MAY, TAMIE SEITZ, JOHN DICKSON, ELIZABETH GALLAGHER, BOBBI BOYLAN, IMANI NICHOLSON shall forfeit to the United States any and all property constituting or derived from any proceeds they obtained directly or indirectly as a result of the said violations; and, any and all of their property used or intended to be used in any manner or part to commit or to facilitate the commission of the said violations; any property, real or personal, involved in such offense, or any property traceable to such property; and, any and all property involved in or used in the commission of said violations; including, but not limited to, the following:

- a. Glock 19 handgun, Model 19, serial number BGUR774, seized from TRAVON GALES on March 11, 2019;
- b. Miscellaneous ammunition, seized from TRAVON GALES on March 11, 2019;

- c. \$3,782.00 in U.S. Currency, seized from TRAVON GALES on March 11, 2019;
- d. \$23,034.00 in U.S. Currency, seized from RONELLE DAVIS' residence on Sanctuary Lane, Sheffield Village, Ohio, on April 3, 2019;
- e. \$2,970.00 in U.S. Currency, seized from ALQUIN WELLS during his arrest on April 3, 2019;
- f. Diamondback, Model DB380, .380, serial number ZB1061, seized from MALCOLM COLLINS' residence on Edna Ave, Cleveland, Ohio, on April 3, 2019;
- g. Miscellaneous ammunition, seized from MALCOLM COLLINS on April 3, 2019;
- h. \$3,300.00 in U.S. Currency, seized from MALCOLM COLLINS's residence on Edna Avenue, Cleveland, Ohio, on April 3, 2019;
- i. FN Herstal Pistol, 5.4 x 28 cal., serial number 386109851, seized from ALQUIN WELLS' residence on Quail Hollow Lane, Sheffield Village, Ohio, on April 3, 2019;
- j. FN Herstal Pistol, 5.4 x 28 cal., serial number 386139319, seized from ALQUIN WELLS' residence on Quail Hollow Lane, Sheffield Village, Ohio, on April 3, 2019;
- k. Glock Pistol, Model 34, 9mm, serial number ADFV037, seized from ALQUIN WELLS' residence on Quail Hollow Lane, Sheffield Village, Ohio, on April 3, 2019;
- l. Miscellaneous ammunition, seized from ALQUIN WELLS on April 3, 2019;
- m. Taurus 38 special revolver, serial number ZG61358, seized from DEMARCO CLAYTON's residence on Brockley Ave., Sheffield, Ohio, on April 3, 2019;
- n. Miscellaneous ammunition, seized from DEMARCO CLAYTON on April 3, 2019; and,

- o. \$11,000.00 in U.S. Currency, seized from DEMARCO CLAYTON's residence on Brockley Ave., and his vehicle at the same location in Sheffield, Ohio, on April 3, 2019.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.